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February 2, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc.*
E911 Quarterly Report – CC Docket No. 94-102

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin
Lee J. Rosen

Attachment

cc: David Solomon, Chief, Enforcement Bureau
John Muleta, Chief, Wireless Telecommunications Bureau
Tim Ryan, Executive Director, APCO
Robert M. Gurss, Counsel for APCO
Terry Peters, Executive Director, NENA
James R. Hobson, Counsel for NENA and NASNA
Steve Marzolf, President, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

E911 Status – Quarterly Report

CC Docket No. 94-102

February 2, 2004

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,¹ Dobson Cellular Systems, Inc.,² as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including: the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made,³ Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

Phase I Service

DCS has received 81 requests for Phase I services and has activated service in 70 of these jurisdictions. DCS has worked diligently with its third-party location solution vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. The company remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 11 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment.⁴ As a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to begin deployment of a network-based solution.

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation ("ACC"), which is an affiliate of DCS.

³ As indicated in the attached chart, the provided "request date" indicates the date the PSAP/requesting entity sent its request to DCS. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules. 47 C.F.R. § 20.18(j); see also *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems*, *Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001) ("*Richardson*").

⁴ As noted by the Commission, DCS is in the process of overlaying its TDMA network with GSM/GPRS technology. See *Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, *Eighth Report*, 18 FCC Rcd 14783, 14821 (2003).

DCS's network consists of approximately 22 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks ("Nortel"), the rest utilizing Lucent Technologies ("Lucent") TDMA network equipment. DCS has worked with these equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August 2002 and by Nortel by June 2002.

In addition, DCS has executed an exclusive contract with Andrew Corporation ("Andrew") to provide the Position Determining Entity equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services for all its Phase II requests. DCS is currently deploying Phase II services in accordance with mutually agreed to timetables, which have been negotiated or are currently under discussion with PSAPs.

B. Phase II Requests

DCS has received requests for Phase II service from the following jurisdictions: Anchorage, AK, Tuscola, Mason-Oceana, Lake, and Sanilac Counties, MI; Austin and Henderson Counties, TX; Talbot and St. Mary's Counties, MD; Erie County, PA; Allegany, Cattaraugus, Chautauqua and Genesee Counties, NY. The status of these requests is detailed in the attachment. For each request, DCS is proceeding with deployment in good faith, even for PSAPs who have not yet provided *Richardson* documentation.

To ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.⁵ DCS has received a response to its request from all of these PSAPs and is proceeding in good faith and has signed a contract with Andrew to provide Phase II capabilities in Erie, Cattaraugus, Chautauqua, Genesee and Austin Counties. DCS has also requested that the PSAP provide documentation pursuant to the *Richardson* criteria,⁶ and was notified by the LEC that the county is not ready to accept Phase II at this time. Finally, on February 11, 2003 DCS sent correspondence to Austin County requesting documentation pursuant to the *Richardson* criteria. DCS has received a reply from the county and considers Austin County's request valid.

C. Deployment Issues

In order to meet the Commission's network-based accuracy requirements, Andrew Corporation has informed the company that it will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

DCS brought similar matters to the Commission's attention in its original waiver request.⁷ Accordingly, if necessary, DCS may avail itself of further waiver procedures to

⁵ *Richardson*, 16 FCC Rcd at 18986-87.

⁶ *Id.*

⁷ See DCS Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁸

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSAs.

⁸ See *Order to Stay*, 17 FCC Rcd at 14853.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
10	Anchorage Police Department	AK	Anchorage Borough	1	TDMA/GSM	05/15/2003		Y	N			1,2	DCS considered original request valid. DCS later learned the PSAP did not have contract with LEC. DCS received email on 10/22/03 from PSAP stating that contract could be signed within a few days. PSAP will send out another RFS.
10	Anchorage Police Department	AK	Anchorage Borough	2	TDMA/GSM	05/15/2003		Y	N			1,2	DCS considered original request valid. DCS later learned the PSAP did not have contract with LEC. DCS received email on 10/22/03 from PSAP stating that contract could be signed within a few days. PSAP will send out another RFS.
3429	Kalkaska County Central Dispatch	MI	Kalkaska	1	TDMA/GSM	04/30/2001		N	Y	04/08/2002			
3459	Mason-Oceana 9-1-1-Mason	MI	Mason	1	TDMA/GSM	09/01/2000		N	Y	08/19/2002			
3459	Mason-Oceana 9-1-1-Mason	MI	Mason	2	TDMA/GSM	09/30/2003		N	N		03/30/2004		
3454	Manistee County Central Dispatch	MI	Manistee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3517	Osceola County Sheriffs Office	MI	Osceola	1	TDMA/GSM	09/01/2000		N	Y	04/25/2002			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3459	Lake County 9-1-1 Central Dispatch	MI	Lake	2	TDMA/GSM	10/23/2003		N	N		04/23/2004		
3316	Antrim County Central Dispatch	MI	Antrim	1	TDMA/GSM	11/11/2001		Y	Y	10/13/2003			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	1	TDMA/GSM	09/01/2000		N	Y	04/08/2002			
3442	Leelanau County Sheriffs Department	MI	Leelanau	1	TDMA/GSM	09/01/2000		N	Y	03/18/2002			
3587	Wexford County Central Dispatch	MI	Wexford	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3346	CCE Central Dispatch-Emmet	MI	Emmet	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3330	Benzie County Sheriffs Department	MI	Benzie	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	1	TDMA/GSM	09/01/2000		N	Y	03/18/2002			
3415	Huron County Central Dispatch	MI	Huron	1	TDMA/GSM	09/01/2000		N	Y	02/15/2002			
3416	Huron County Central Dispatch	MI	Huron	2	TDMA/GSM	01/07/2004		N	N		07/07/2004		
3550	Sanilac County Central Dispatch	MI	Sanilac	1	TDMA/GSM	09/01/2000		N	Y	02/22/2002			
3550	Sanilac County Central Dispatch	MI	Sanilac	2	TDMA/GSM	11/03/2003		N	N		05/03/2004		
3572	Tuscola County Central Dispatch	MI	Tuscola	1	TDMA/GSM	09/01/2000		N	Y	02/13/2002			
3572	Tuscola County Central Dispatch	MI	Tuscola	2	TDMA/GSM	01/07/2004		N	N		07/07/2004		
3763	Caldwell County Sheriffs Office	MO	Caldwell	1	TDMA/GSM	07/23/2003		N	N		TBD	1	Dobson is working with PSAP and LEC to deploy. LEC has had difficulty establishing trunks to the Selective Router.
3785	Clinton County Sheriffs Office	MO	Clinton	1	TDMA/GSM	07/23/2003		N	N		TBD	1	Dobson is working with PSAP and LEC to deploy. LEC has had difficulty establishing trunks to the Selective Router.
3795	De Kalb County Sheriffs Office	MO	De Kalb	1	TDMA/GSM	07/23/2003		N	N		TBD	1	Dobson is working with PSAP and LEC to deploy. LEC has had difficulty establishing trunks to the Selective Router.
3860	Maryville Police Department	MO	Maryville City	1	TDMA/GSM	08/27/2003		N	N		02/27/2004		
6423	Bastrop County Sheriffs Office	TX	Bastrop	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6467	Caldwell County Sheriffs Office	TX	Caldwell	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6578	Fayette County Sheriffs Office	TX	Fayette	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6725	Lee County Sheriffs Office	TX	Lee	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6612	Gonzales County Sheriffs Office	TX	Gonzales	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6674	Jackson County Sheriffs Office	TX	Jackson	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
6722	Lavaca County Sheriffs Office	TX	Lavaca	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6865	Rockdale Police Department	TX	Milam	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6627	Hamilton County Sheriffs Office	TX	Hamilton	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6575	Falls County Sheriffs Office	TX	Falls	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6587	Freestone Sheriffs Office	TX	Freestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6733	Limestone Sheriffs Office	TX	Limestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6446	Bosque County Sheriffs Office	TX	Bosque	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6649	Hill County Sheriffs Office	TX	Hill	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6498	Colorado County Sheriffs Office	TX	Colorado	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6592	Ft Bend County Sheriffs Office	TX	Fort Bend	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6757	Matagorda County Sheriffs Office	TX	Matagorda	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6993	Wharton County Sheriffs Office	TX	Wharton	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6572	Erath County Sheriffs Office	TX	Erath	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6411	Armstrong County Sheriffs Office	TX	Armstrong	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6476	Carson County Sheriffs Office	TX	Carson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6496	Collingsworth County Sheriffs Office	TX	Collingsworth	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6547	Donley County Sheriffs Office	TX	Donely	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6817	Pampa Police Department	TX	Gray	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6628	Hansford County Sheriffs Office	TX	Hansford	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6640	Hemphill County Sheriffs Office	TX	Hemphill	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6445	Borger Police Department	TX	Hutchinson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6735	Lipscomb County Sheriffs Office	TX	Lipscomb	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6827	Perryton Police Department	TX	Ochiltree	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6861	Roberts County Sheriffs Office	TX	Roberts	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6995	Wheeler County Sheriffs Office	TX	Wheeler	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6862	Robertson County Sheriff	TX	Robertson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6464	Burleson County Sheriffs Office	TX	Burleson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6726	Leon Sheriffs Office	TX	Leon	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6978	Washington County Sheriffs Department	TX	Washington	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6402	Anderson Sheriffs Office	TX	Anderson	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6966	Van Zandt Sheriffs Office	TX	Van Zandt	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6492	Coleman Police Department	TX	Coleman	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6462	Brownwood Police Department	TX	Brownwood	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6500	Comanche County Sheriffs Office	TX	Comanche	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6873	Runnels County Sheriffs Office	TX	Runnels	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6555	Eastland County Central Dispatch	TX	Eastland	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6415	Austin County Sheriffs Department	TX	Austin	1	TDMA/GSM	01/14/2002		N	Y	03/13/2003			
6415	Austin County Sheriffs Department	TX	Austin	2	TDMA/GSM	01/28/2003		N	N		TBD	4,6	Dobson cell sites lined like a "string of pearls." Working with Andrew on solution that will meet accuracy standards. Dobson has informed PSAP of technical problems and has discussed alternative solutions with PSAP.
6641	Henderson County Sheriffs Department	TX	Henderson	1	TDMA/GSM	01/09/2003		N	Y	08/13/2003			
6641	Henderson County Sheriffs Department	TX	Henderson	2	TDMA/GSM	07/29/2003		N	N		TBD	4	Dobson is in contact with local PSAP to discuss deployment timeline and expects to have Phase II service provided as soon as possible.
3235	Talbot County Emergency Management Agency	MD	Talbot	1	TDMA/GSM	08/07/2002		N	Y	05/21/2003			
3235	Talbot County Emergency Management Agency	MD	Talbot	2	TDMA/GSM	05/27/2003		Y	Y	01/09/2004			
3227	Kent County Emergency Management	MD	Kent	1	TDMA/GSM	04/23/2003		N	N		02/06/2004	1	Dobson is ready to deploy. LEC has had difficulty establishing trunks to the Selective Router.
3232	Somerset County Department of Emergency	MD	Somerset	1	TDMA/GSM	07/15/2003		N	Y	12/10/2003			

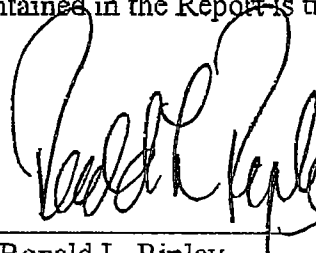
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3233	St Marys County Emergency Communicatio	MD	St. Mary's	1	TDMA/GSM	07/03/2003		N	N		02/04/2004	1	Dobson is ready to deploy. LEC has had difficulty establishing trunks to the Selective Router.
3233	St Marys County Emergency Communicatio	MD	St. Mary's	2	TDMA/GSM	07/03/2003		N	N		TBD	4	Market is in the process of being acquired by another carrier who will deploy Phase II. PSAP has agreed to alternative implementation date.
3214	Caroline County Emergency Management	MD	Caroline	1	TDMA/GSM	04/09/2003		N	Y	01/20/2004			
3212	Calvert County Dept. of Public Safety	MD	Calvert	1	TDMA/GSM	12/16/2003		N	N		06/16/2004		
3239	Worcester County	MD	Worcester	1	TDMA/GSM	12/22/2003		N	N		06/22/2004		
3219	Dorchester County 9-1-1 Emergency Comm	MD	Dorchester	1	TDMA/GSM	10/24/2003		N	N		04/24/2004		
3205	Allegany County Emergency Services	MD	Allegany	1	TDMA/GSM	11/21/2003		N	N		05/21/2004		
5887	Erie County 9-1-1 Center	PA	Erie	1	TDMA/GSM	04/12/2001		N	Y	02/06/2002			
5887	Erie County 9-1-1 Center	PA	Erie	2	TDMA/GSM	04/12/2001		N	Y	10/30/2003			
5878	Crawford County Office of Emergency Servi	PA	Crawford	1	TDMA/GSM	03/26/2002		N	Y	02/19/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	1	TDMA/GSM	07/18/2002		N	Y	03/26/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	2	TDMA/GSM	06/13/2003		Y	N		TBD	1,4	Dobson is currently installing all requisite equipment and expects to start testing in early February. Dobson is working with PSAP to determine deployment date.
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	1	TDMA/GSM	05/22/2001		N	Y	08/06/2002			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	TDMA/GSM	06/05/2002		N	N		TBD	2,4,6	PDE hardware has been shipped; third party provider to begin installation in early August. PDE equipment has been installed.
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	1	TDMA/GSM	06/01/2001		N	Y	05/17/2002			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	TDMA/GSM	12/13/2002		Y	N		TBD	2,6	DCS received confirmation on 7/16/03 that PSAP is now ready for Phase II. Intrado SALI circuits due mid October. Dobson will contact the PSAP to discuss deployment date.
5084	Genesee County Sheriffs Office	NY	Genesee	1	TDMA/GSM	04/10/2001		N	Y	11/21/2002			
5084	Genesee County Sheriffs Office	NY	Genesee	2	TDMA/GSM	09/09/2002		N	N		TBD	2,4,6	PDE hardware has been shipped; third party provider to begin installation in early August. PDE equipment has been installed.

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read 'Ronald L. Ripley', written over a horizontal line.

Ronald L. Ripley
Senior Vice President &
General Counsel

Executed on: 1/30/04

CERTIFICATE OF SERVICE

I, Michelle A. Bynum, hereby certify that on the 2nd day of February 2004, copies of the foregoing "E911 Quarterly Report" have been served by either first class mail, postage prepaid to the following:

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/s/ Michelle A. Bynum

Michelle A. Bynum

* *Via Hand Delivery*